

Harold Derschowitz (x263)

From: numoh@umohlaw.com
Sent: Wednesday, June 25, 2008 10:32 PM
To: Deborah MartinNorcross
Cc: Harold Derschowitz (x263); chidieze@yahoo.com
Subject: RE: Mann v. Plus One, etc.

Harold--

Did you seek leave to serve additional interrogatories on the plaintiff. Pursuant to the court' order, all paper discovery was to be served by April 4, 2008. Moreover, your first set of interrogatories contained 31 interrogatories and the second set contains an additional 31 interrogatories. Even if we agree that the defendants get 50 interrogatories, how do you justify serving us with 62? Also, the interrogatories violate the local rules of the SDNY. Accordingly, we reject these interrogatories.

Deborah--

What document request and/or interrogatories are these documents supplementing? Please refer plaintiff to the number(s).

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----- Original Message -----

Subject: Mann v. Plus One, etc.

From: "Deborah MartinNorcross" <dmnorcross@martinnorcross.com>

Date: Tue, June 24, 2008 9:51 am

To: "Harold Derschowitz (x263)" <HDERSCHOWITZ@lskdnylaw.com>,
chidieze@yahoo.com, "numoh@umohlaw.com" <numoh@umohlaw.com>

6/26/2008